

JOHN DOE 6	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
v.	:	
	:	No. 2:13-cv-00336-AB
THE PENNSYLVANIA STATE	:	
UNIVERSITY; THE SECOND MILE; AND	:	
GERALD SANDUSKY, INDIVIDUALLY	:	
AND IN HIS OFFICIAL CAPACITY FOR	:	
THE SECOND MILE	:	
	:	JURY TRIAL DEMANDED
Defendants	:	
	:	

For the reasons set forth in the Memorandum of Law filed concurrently with this Motion, Plaintiff John Doe 6 opposes Defendant The Pennsylvania State University's Motion to Compel Discovery From Plaintiff [Docket 132] for documents responsive to Defendant's Second Set of Requests for Production of Documents Directed to Plaintiff John Doe 6, and to pay the University's expenses incurred in making said motion. Plaintiff incorporates his Memorandum of Law in Opposition to the Motion to Compel Discovery from Plaintiff as though fully set forth herein at length.

By:

/s/ Jason B. Penn

 Howard Alan Janet, Esquire
 (Pro Hac Vice)

Kenneth M. Suggs, Esquire
(Pro Hac Vice)
Jason B. Penn, Esquire
(Pro Hac Vice)
JANET, JENNER & SUGGS, LLC
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(410) 653-3200
(410) 653-6903 (fax)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have filed the foregoing Plaintiff's Opposition to Defendant The Pennsylvania State University's Motion to Compel Discovery from Plaintiff and Memorandum of Law with ECF and it is available therein for download by counsel for all parties who are ECF subscribers.

/s/ Jason B. Penn

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	:	

Plaintiff John Doe 6 (hereafter “Plaintiff” or “John Doe 6”), by his attorneys, Janet, Jenner & Suggs, LLC, submits the following Memorandum of Law in Opposition to the Motion to Compel Discovery From Plaintiff submitted by Defendant The Pennsylvania State University [Dkt 132] (hereafter “PSU”):

ORAL HEARING REQUESTED

Dated this 29th day of May, 2015

By:

/s/ Jason B. Penn

Howard Alan Janet, Esquire

(pro hac vice)

Kenneth M. Suggs, Esquire

(pro hac vice)

Jason B. Penn, Esquire

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Anita B. Brody, J.